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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

MATTHEW A. I. UA CRUADHLAOICH,

Plaintiff,

v.

JOHN E. BRYSON, Secretary of  
Commerce, of the UNITED STATES  
DEPARTMENT OF COMMERCE, a  
government entity,

Defendant.

**No. C 12-2723 JSW**

**JOINT ADMINISTRATIVE  
MOTION FOR EXTENSION OF  
TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANT'S  
NOTICE OF MOTION AND  
MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT;  
~~—[PROPOSED]~~ ORDER**

**JOINT ADMINISTRATIVE MOTION FOR EXTENSION OF TIME FOR PLAINTIFF  
TO RESPOND TO DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

Plaintiff Matthew A.I. Ua Cruadhlaoich hereby moves for an extension of 10 calendar days, until December 14, 2012, for Plaintiff to respond to Defendant's Notice of Motion and Motion to Dismiss Plaintiff's Complaint (hereinafter "Motion to Dismiss"), which was filed on November 20, 2012. Defendant does not oppose this administrative motion. In support, the Plaintiff states as follows:

1. In its Motion to Dismiss, Defendant raised various procedural and substantive issues in arguing for the dismissal of each of Plaintiff's causes of action. These issues involve detailed issues of law and, moreover, the motion is a critical one, requiring Plaintiff to invest a reasonable amount of time in order to adequately respond to same.

2. Plaintiff stated in his Plaintiff's Separate Case Management Statement (hereinafter "Case Management Statement") filed on Friday, November 30, 2012, that he intended to timely respond to Defendant's Motion to Dismiss. Plaintiff stated this in the anticipation that he would be able to complete an adequate response to Defendant's Motion to Dismiss over this past weekend of December 1 through December 2, 2012.

3. Because Plaintiff is *pro se*, he must rely upon public resources, especially law libraries, for most of his legal research.

4. Plaintiff works full-time during the week.

5. At the time of filing his Case Management Statement, Plaintiff, who is not an attorney and does not regularly make use of legal resources, did not realize that the law libraries in his area, the Bernard E. Witkin Alameda County Law Library in Hayward, California, and the Bernard E. Witkin Alameda County Law Library in Oakland, California, are closed on the

1 weekends. Plaintiff realized after filing his Case Management Statement that he would not  
2 practically be able complete his research this past weekend.

3 6. Plaintiff was not able to visit either of these law libraries on Monday, December 3,  
4 2012, or today, Tuesday, December 4, 2012, due to his work obligations.

5 7. As the hearing on Defendant's Motion to Dismiss is scheduled for February 22, 2013,  
6 and the Initial Case Management Conference in this case is scheduled for March 15, 2013, the  
7 extension of time sought herein would not reasonably be expected to interfere with the overall  
8 pace of progress of this case.

9 8. The parties have conferred. Defendant does not oppose the extension and has agreed  
10 to jointly file this administrative motion to expedite the Court's review and consideration of  
11 same.

12 9. For all of the above reasons, Plaintiff herein requests an extension through Friday,  
13 December 14, 2012, for Plaintiff to respond to Defendant's Motion to Dismiss, which would  
14 render the response due 24 days from the date Defendant filed its Motion to Dismiss.  
15 Defendant's reply would then be due 7 days after Plaintiff files his opposition.

16 Dated: December 4, 2012

17 /s/

18 Matthew A. I. Ua Cruadhlaioich  
19 Plaintiff Pro Se

20 MELINDA L. HAAG  
21 United States Attorney

22 /s/

23 Juan D. Walker<sup>1</sup>  
24 Attorneys for the Federal Defendant

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27 <sup>1</sup> I, Juan D. Walker, hereby attest, in accordance with the Northern District of California's Local Rule 5-1,  
28 the concurrence in the filing of this document has been obtained from the other signatory listed on this document.

~~[PROPOSED]~~ ORDER

IT IS SO ORDERED. Plaintiff's opposition to Defendant's Motion to Dismiss is due on or before December 14, 2012. Defendant's reply brief is due on or before December 21, 2012.

Date: December 5, 2012

  
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JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE